

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CORDIA FOSTER and CISLYN WRIGHT, 21-cv-11224 (CM)

*Plaintiffs,*

-against-

ELYSE DULA a/k/a ELYSE SNOW  
and IAN K. SNOW,

*Defendants.*

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### **Plaintiffs' Proposed Voir Dire Questions**

Pursuant to Fed. R. Civ. P. 47(a), Plaintiffs Cordia Foster and Cislyn Wright request, through their undersigned counsel, request that the Court permit counsel to examine prospective jurors with respect to the following questions, with appropriate follow-up questions. In the alternative, Plaintiffs request that the Court include the following questions in its own examination of the jurors, with such follow-up questions as the Court deems appropriate.

#### **General Questions**

1. What is your marital status and number of children, if any?
2. What is your highest level of education, and major areas of study, if any?
3. What if any memberships do you have in any groups or organizations?
4. What are your favorite types of reading material, including newspapers and magazines you read and any books you are currently reading?
5. What are your favorite types of TV shows?
6. Do you regularly listen to talk radio, and if so, to which programs?
7. Do you regularly use the internet to visit sites other than e-mail or personal business? If so, what types of websites sites you visit most often?

**Experience/Attitude Questions**

8. Have you received specialized or specific training on how to avoid race discrimination?
9. Do you believe that if people discriminate or retaliate, they will admit that they are doing so?
10. Do you believe that employers should be allowed to discriminate against an employee if the employee is well paid?
11. Do you believe that if you think you've been subjected to discrimination and/or retaliation that you should quit your job rather than seek redress?
12. If you found that discrimination or retaliation had occurred, would you have trouble awarding damages for emotional distress?

Respectfully submitted,

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By /S/ Scott A. Lucas